

Civil Case No.: 1:06 CV 199

[illegible]

a. The attorneys appearing in this case for any party to this litigation and personnel who are directly employed staff members of those attorneys and their law firms who are assisting the attorneys in their work on this action;

b. Those agents of any party to this litigation, other than attorneys and attorneys' staff members described in sub-paragraph 2.a., whose assistance is required in the preparation of this case for trial and who must have access to the materials to render assistance;

c. Experts or consultants retained by any party to this litigation or their attorneys in preparation of this case, or trial of this case;

d. The court and court personnel, including stenographic reporters, engaged in such proceedings as are necessarily incident to the preparation and trial of this case;

e. Parties and potential fact witnesses in this action and persons noticed for deposition and/or designated as trial witnesses, to the extent necessary for the investigation of the case, the preparation of the witness for any testimony and taking of any testimony. Such parties or witnesses shall be advised of this order and shall be subject to the provisions of this order; or

f. Such other persons as ordered by the court.

3. Any party may unilaterally apply to the court for modification of this protective order. Nothing in the protective order shall be deemed to prejudice their rights to seek modification.

4. Following of this litigation, the provisions of this protective order relating to the confidentiality of protected documents and information shall remain in full force and effect and continue to be binding, except with respect to documents or information which are no longer confidential.

Signed: September 18, 2006

Dennis L. Howell

Dennis L. Howell
United States Magistrate Judge

